

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

INTERNATIONAL PAYMENT ADVISORS
LTD., a Nevada limited liability company,

Case No.: 2:19-cv-203-VCF

Plaintiff,

V.

PAYSAFE SERVICES (US) LLC, a Delaware Corporation; and DOES 1-10 inclusive,

**STIPULATION AND PROPOSED
ORDER TO EXTEND DEADLINE TO
FILE JOINT PRETRIAL ORDER**

Fourth Request

Defendants.

AND ALL RELATED CLAIMS.

AND ALL RELATED CLAIMS.

Plaintiff/Counter-Defendant International Payment Advisors LTD, Counter-Defendant Marc Maxwell, and Defendant/Counterclaimant Global Merchant Advisors, LLC, f/k/a Paysafe Services (US) LLC, by and through their respective counsel of record, stipulate and respectfully request that the Court extend the deadline for the parties to submit the Joint Pretrial Order by fourteen (14) days, extending the deadline from July 14, 2022 to July 28, 2022.

In this case, there has been more than 2 million pages of documents exchanged and more than 20 depositions taken. This is the fourth request for an extension of this deadline and is requested because the parties need the additional time to complete the extensive work involved in reviewing, designating, and preparing all items required in the Joint Pretrial Order under the Local Rules, as well as exchanging and meeting and conferring on the same for incorporation into the final order. The parties have already made several initial and rebuttal exchanges of such materials, and met and conferred about them in good faith, but the substantial effort needed to complete the final required items and have further discussions about them is taking longer than anticipated due to the high volume of material at issue. Therefore, the parties wish to ensure that they have the necessary time for the extensive meet and confer process to be completed in order to finalize and file the Joint Pre Trial Order. This request is also made in light of the fact that the Court indicated at a hearing on July 5, 2022 that it would we amenable to an extension.

1 In sum, the parties have been diligent in their efforts, and will continue to be so and work
2 together. The parties seek this extension to further that effort and this request is made in good faith
3 and not for purposes of delay.

4 Dated this 11th day of July 2022.

Dated this 11th day of July 2022.

5 KRAVITZ, SCHNITZER & JOHNSON,
6 CHTD.

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15 *Attorneys for Global Merchant Advisors, LLC,
f/k/a Paysafe Services (US) LLC*

16 **ORDER**

17 Based upon the stipulation of the parties, and with good cause appearing, IT IS HEREBY
18 ORDERED that the parties shall submit the Joint Pretrial Order on or before July 28, 2022.

19 IT IS SO ORDERED.



20
21 UNITED STATES MAGISTRATE JUDGE
22 Dated this 13th day of July, 2022